

§761.30(i) Use and Reuse of PCBs in Natural Gas Pipeline Systems

General

Q: How do PCBs get into natural gas pipelines?

A: PCBs may have entered natural gas pipelines through the use of PCB-containing lubricants in turbine compressors and pipeline valves; through fogging of the pipeline system with PCB-containing oil vapor; or through migration from other contaminated systems. PCBs move primarily with the liquid condensate that forms in the pipeline.

Q: Under the new regulations at §761.30(i), can I introduce PCBs into a natural gas pipeline system?

A: No, §761.30(i) does not allow the introduction of PCBs into a natural gas pipeline system. (See the preamble discussion at 63 FR 35396, June 29, 1998).

Applicability of 120 Day Characterization Time Frame

Q: If you plan to abandon pipe in the near future, does the 120 day time frame for characterization under §761.30(i)(1)(iii)(A) apply now? When does the 120 day time frame for characterization of pipe begin?

A: The pipe is technically “in use” until abandonment or removal occurs. Therefore, all applicable requirements in §761.30(i) apply until abandonment or removal takes place. The 120 day characterization time frame begins with the effective date of the rule (8/28/98) for cases where the owner/operator knows there is PCB contamination at concentrations ≥ 50 ppm. Otherwise, the 120 day period begins after detection of PCB concentrations ≥ 50 ppm occurs.

Potential Sources

Q: Can I use historical data to document absence of sources in a system?

A: Yes. (See §761.30(i)(1)(iii)(E).)

Q: If grease containing PCBs was added to a valve, would the valve be considered a source?

A: Section 761.30(i)(1)(iii)(A)(3) excludes valves as being a potential source. The intention of this section was to leave out small items such as valves, as long as an attempt is being made to remove PCBs from the system. If there are no other potential sources in the system, but there are PCBs ≥ 50 ppm in the system, then §761.30(i)(1)(iii)(B) would apply.

Q: Are meters (specifically custody transfer meters and customer meters) sources?

A: Custody transfer meters could be potential sources of introduction of PCBs into the natural gas pipeline system. However, the Agency would need more specific information about the meter to make a definite determination. Customer meters are most likely not potential sources of PCBs because they are located at the end of the natural gas pipeline and would be unlikely to introduce PCBs into the system.

Q: Is a paper-like filter in a natural gas pipeline system, similar to a car's oil filter, considered a "source"?

A: If this filter is kept relatively clean, it most likely will not be a potential source. However, if the filter is allowed to fill up with liquids and is not cleaned out (i.e. per standard operating procedures and manufacturer's recommendations), it could be a potential source. In this case, it could be a source because it could be introducing PCBs ≥ 50 ppm into the pipeline system. The determining factor is whether or not it is introducing PCBs ≥ 50 ppm into the pipeline system and causing PCB contamination downstream.

Characterization

Q: Under §761.30(i), is use of organic liquids for characterization of the natural gas pipeline system required?

A: Yes. EPA's intention was for organic liquids to be used to characterize the PCB contamination in the natural gas pipeline system. EPA will make a technical correction to §761.30(i)(4) to clarify this.

Q: When conducting the annual sampling under §761.30(i), what do you do if you don't have liquids present annually?

A: Under the use authorization provisions at §761.30(i), if a pipeline system once contained liquids at 50 ppm or greater but is now relatively dry (i.e., there are no liquids available to test at existing condensate collection points), then the owner/operator of the pipeline system has no further sampling and analysis to do until such time as liquids appear. EPA did not intend to require wipe sampling for characterizing natural gas pipeline systems in use; hence, EPA has made a technical correction at §761.30(i)(4) to drop the reference to wipe samples.

For these relatively "dry" systems with no liquids, the sampling requirements at §761.30(i)(1)(iii)(A)(5) don't apply. However, EPA would expect the owner/operator of the pipeline system to continue to check at least annually for liquids and document their absence under the recordkeeping requirements in §761.30(i)(1)(iii)(C). Should any liquids appear later, the liquids should be tested.

Historical Data for Characterization

Q: Can I use samples collected before August 28, 1998 as historical data?

A: Section 761.30(i)(1)(iii)(E) allows the use of historical data. For purposes of the use authorization at §761.30(i)(1)(iii), any data collected before August 28, 1998 is considered as historical data, provided it is accurate and sufficient.

Pipeline Components and Appurtenances

Q: How do PCB pipeline system components differ from pipeline appurtenances?

A: The term “component” refers to any part of the natural gas pipeline system (as defined at §761.3), to include pipe, appurtenances and compressors. The term “appurtenance” is defined in the definition of “natural gas pipeline system” under §761.3. Appurtenance refers to “instrumentation and vessels directly in contact with transported natural gas such as valves, regulators, drips, filter separators, etc., but not including air compressors.” This list is not all inclusive.

Condensate

Q: Under §761.30(i)(1)(iii)(A)(3), what is the definition of “small liquid condensate collection point.” Does the “condensate” pertain to both hydrocarbon condensate and water condensate?

A: The term “small liquid condensate collection point” is not defined in the regulations. The interpretation of the term was meant to be left open as it refers to items that are similar to drips and valves.

The term “condensate” applies to both hydrocarbon condensate and water condensate. However, for purposes of characterizing the PCB concentration of the pipe, the organic condensate must be analyzed.

Marking

Q: If a gas utility owns customer meters (industrial or residential) and a meter has liquids with PCB concentrations in excess of 50 ppm PCB, must the meter be marked with the M_L mark, in accordance with §761.45(a)?

A: Yes. §761.30(i)(1)(iii)(A)(6) requires marking aboveground sources (e.g. system components) of PCB liquids in natural gas pipeline systems that contain PCBs ≥ 50 ppm.

Q: Do the §761.40(k) marking requirements apply to gas mains and services that are still in service? That is, natural gas is being delivered to our customers. If so, do all aboveground piping that is attached to the gas meter at a structure need to be marked?

How is pipe to be marked?

- A: No, the marking requirements at §761.40(k) do not generally apply to gas mains and services. The marking requirements at §761.40(k) apply to the PCB Items specified in subparagraphs (1) and (2) which include PCB Large Low and High Voltage Capacitors, PCB Transformers, and equipment containing these items. However, if your pipeline system contains these specified PCB Items, then the §761.40(k) regulations would apply.

No, all aboveground piping should not need to be marked. The marking requirements specific to natural gas pipeline systems were promulgated on June 29, 1998 at §761.30(i)(1)(iii)(A)(6). These regulations apply to natural gas pipeline systems owned or operated by sellers or distributors of natural gas where these systems contain PCBs at concentrations of 50 ppm or greater. Section 761.30(i)(1)(iii)(A)(6) requires the marking of aboveground sources (e.g., aboveground equipment such as meters, filters, compressors, valves, or drips) of pipeline liquids at ≥ 50 ppm PCBs with the M_L Mark in accordance with §761.45(a). EPA dropped the former §761.30 marking requirement for underground pipe containing PCBs < 50 ppm in response to public comment. (See the preamble discussion in the June 29, 1998 Federal Register at page 35396.)

Reuse of Pipe and Distribution in Commerce

- Q: In order to reuse contaminated piping for other purposes at a later date, what needs to be done in the interim?***

- A: The provisions for interim storage for reuse are outlined in §761.35. The provisions at §761.35 apply to drained PCB articles. By definition, drained pieces of pipe are considered drained PCB articles.

Note that §761.30(i)(2) and (3) only authorize the reuse of natural gas pipeline that is PCB-Contaminated (10 ug/100cm² - 100 ug/100cm² or 50 ppm - 500 ppm). These sections do not authorize the reuse of pipe that is >100 ug/100cm² or >500 ppm. At these higher concentrations, the pipe would have to be decontaminated in accordance with §761.79(b)(3) to the levels authorized in §761.30(i)(2) and (3) before reuse would be authorized.

Additionally, the regulations do not explicitly authorize the distribution in commerce (e.g. sale, transfer to a third party) of PCB-Contaminated pipe. Thus, sale or transfer to a third party for the reuses listed in §761.30(i)(2) and (3) could only occur if the pipe is decontaminated or meets the decontamination standards in §761.79(b)(3), in accordance with §761.20(c)(5), the general authorization for distribution in commerce.

- Q: What are the requirements that a company must comply with when transporting pipe that is drained of all free-flowing liquids and is contaminated with PCBs at ≤ 10***

$\mu\text{g}/100\text{cm}^2$ to $\leq 100 \text{ ug}/100\text{cm}^2$ or at $>100 \text{ ug}/100\text{cm}^2$? The pipe will be removed and transported to the company's storage facility for reuse by the company.

A: Since the pipe will be reused, it is not a waste and is not subject to manifesting. Because there is no marking requirement for natural gas pipe in use, there is no marking required for storage for reuse.

Q: A section of pipeline has been sampled. The wipe sample shows $<10\text{ug}/100\text{cm}^2$ and the liquid condensate sample shows $<50 \text{ ppm}$. Is this pipe regulated? Can it be sold?

A: At PCB concentrations $<10\text{ug}/100\text{cm}^2$ or $<50 \text{ ppm}$, the pipeline is unregulated for use at §761.30(i) and is unregulated for abandonment or disposal at §761.60(b)(5). This pipe can be sold under §761.20(c)(5)(ii), which allows the distribution in commerce of materials that currently meet a decontamination standard in §761.79(b). The decontamination standard for non-porous surfaces in contact with liquid PCBs is $<10\text{ug}/100\text{cm}^2$, provided all free-flowing liquids have been removed (§761.79(b)(3)).